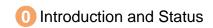


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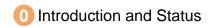


## In 2016, the FCC charged USAC to develop and implement the National Verifier to determine Lifeline eligibility

In March 2016, the FCC adopted the 2016 Lifeline Order, further updating the Lifeline program to, among other things, streamline eligibility verification for enrollment and recertification.

The 2016 Lifeline Order tasked USAC with the creation of a National Verifier to standardize eligibility verification across all states and territories and to perform the following functions:

- Create the Lifeline Eligibility Database (LED), which will be connected to state and federal data sources, 1 to determine eligibility for both initial enrollment and annual recertification;
- Allow service providers and consumers to check eligibility or enrollment status; and
- Calculate payments to service providers based on data available through National Verifier.



# In the 2016 Lifeline Order, the FCC identified three main goals for the National Verifier

1

#### **Stronger Program Integrity**



- Independent eligibility verification, with more automatic checks, conducted directly by USAC to reduce waste, fraud, and abuse
- Single eligibility system to audit and report on potential fraud metrics
- Streamlined, consistent processes to distinguish mistakes from waste, fraud, and abuse

Enhanced Customer Experience



- Streamlined access to eligibility information for Service Providers
- States relieved of maintaining computer matching agreements and interfaces with multiple SPs
- More automatic checks of data sources to determine eligibility
- Central source of program information and support for consumers

(3

#### **Cost Effectiveness**



- Service providers relieved of eligibility verification burden
- Lower cost to aggregated system due to more streamlined processes:
  - More automated verification to reduce costly manual reviews; and
  - More automated recertification to reduce costly outreach

USAC designed the National Verifier to meet these objectives. Stakeholder feedback informs the National Verifier implementation and USAC continuously integrates stakeholder input throughout the multi-year rollout. A list of recent and upcoming improvements can be found on slide 10.



### Overview of the National Verifier Plan

#### **PURPOSE**

This document describes the systems and processes of the National Verifier (NV), provides a status of the project, and details the work that remains to make it a success.

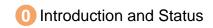
#### BACKGROUND

This is the fifth update of the National Verifier Plan (the NV Plan) which was created in response to the 2016 Lifeline Order adopted by the Federal Communications Commission (FCC) in March 2016.

- Since the initial release of the NV Plan in January 2017, USAC has updated this document every six months, as required by the 2016 Lifeline Order.
- The Wireline Competition Bureau reviewed and provided input on the initial release and each subsequent update.

In addition to the NV Plan, interested parties can reference the NV section of the USAC website for updates on the NV implementation. Stakeholders can provide comments on the NV Plan to USAC by visiting the NV website.

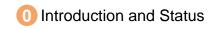
 Stakeholders can submit comments via email at <u>LifelineProgram@usac.org</u>; however, USAC recommends using the functionality on the NV website.



## **Status of the National Verifier (1/2)**

On June 18, 2018, USAC and the FCC deployed the NV system, kicking off the initial Soft Launch in six states. To date, the NV has launched in a total of 38 states/territories across six separate launches. Of those launches, five have fully launched, and the June 2019 launch is in the Soft Launch phase.

June 2018 l Soft Launch: Full Launch:	6/18/18	October 2018 Launch Soft Launch: 10/15/18 Full Launch: 1/15/19	Soft Laund	2018 Launch ch: 12/4/18 ch: 3/5/19
Colorac	do	Guam	Missouri	
Mississi	ppi	Hawaii	North Carolina	
Montar	na	Idaho	Pennsylvania	
New Mex	xico	New Hampshire	Tennessee	
Utah		North Dakota		
Wyomir	ng	South Dakota		
February 2019 Launch Soft Launch: 2/5/19 Full Launch: 5/7/19		March 2019 Launch Soft Launch: 3/12/19 Full Launch: 6/11/19	June 2019 Launch Soft Launch: 6/25/19 Full Launch: TBD	
Alaska	Rhode Island	Indiana	Arizona	Nevada
American Samoa	US Virgin Islands	Kentucky	Connecticut	New York
Northern Mariana Islands		Michigan	Georgia	Virginia
District of Colombia			Iowa	Vermont
Delaware			Kansas	West Virginia
Maine			Nebraska	

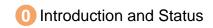


## Status of the National Verifier (2/2)

States and territories in the first five launches are in the Full Launch phase, meaning carriers are required to use the NV system. In addition, consumers have access to use the system through the Consumer Portal in these states.

Since the June 2019 launch is still in its Soft Launch phase, NV system use is optional for carriers in those states and consumers do not have access to the system yet. USAC and the FCC will provide advance notice of the full launches to all carriers and state agencies in each scheduled launch.

USAC communicates detailed content, geared toward specific stakeholder groups regularly through <u>NV website</u>, <u>newsletters</u>, and <u>webinars</u>.



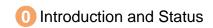
## National Verifier in 2019 (1/2)

The 2016 Lifeline Order indicates that all states and territories should be rolled into the National Verifier by the end of 2019. To date, USAC has rolled a total of 38 states/territories into the National Verifier and is working to roll in the remaining 18 states/territories by the end of the year.

While all states have access to available federal connections, some states/territories will launch without a connection to a state database due to a series of challenges. Some of these challenges include, but are not limited to, impediments to technical development within the state as well as state statutory changes needed to allow data sharing. Any applications that do not pass automated database checks will be reviewed manually.

For the remaining states, USAC and the FCC are working closely with state agencies to develop computer matching agreements and execute technical development. See the Eligibility Data Sources section for more information.

USAC, in conjunction with the FCC, plans to have regular launches throughout 2019. USAC will place each state/territory in one of the launches. Placement is driven by readiness, expected volume of transactions, and our desire for even distribution of states across launches.



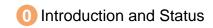
## National Verifier in 2019 (2/2)

Though a number of states will launch without a connection to a state database, the costs and risks associated with manual review will be mitigated by the establishment of federal database connections, as consumers in all states will be checked against federal database sources.

To date, USAC has a live database connection to the United States Department of Housing and Urban Development (HUD) database, providing eligibility confirmations for consumers receiving Federal Public Housing Assistance.

USAC is also working with the following federal agencies to increase automation and realtime eligibility confirmations across all states:

- Centers for Medicare & Medicaid Services (CMS): A Computer Matching Agreement (CMA) with CMS has been executed, and the CMA has been published in the Federal Register for public comment. Technical development and testing is underway, and USAC, the FCC, and CMS are on track to establish a connection in Q4 2019.
  - USAC estimates that CMS will automatically verify program eligibility for up to 60% of the Lifeline population given the overlap between Medicaid and SNAP participation.
- Veterans Benefits Association (VBA): USAC and the FCC have been actively working with the VBA to establish a connection.



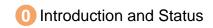
### **Performance of the National Verifier**

On a daily basis, USAC tracks the performance of the NV and the related operational processes, including those performed by the Lifeline Support Center, in order to identify inefficiencies and areas for improvement.

USAC utilizes operational metrics to measure and improve processes to ensure a consistent and reliable experience for current and prospective Lifeline consumers.

The below metrics represent activity from November 2018 through June 2019. These metrics are all in line with our expectations; however, we will continue to strive for ways to gain additional efficiencies.

Metric Name	Metric
Applications validated through state/federal eligibility connections	64%
Average automated database response time	5 seconds
Average time for application from start to finish (fully automated)	4 minutes
Average manual review time (non-escalated)	6.25 minutes
Average call waiting time	2.5 minutes
Applications submitted through the consumer portal <sup>1</sup>	65%



### **Continuous Improvement of the National Verifier**

## USAC and the FCC commit to pursuing continuous improvement of functionality and processes.

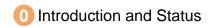
As such, we gather feedback from stakeholders and prioritize enhancements. Recent updates include:

- Enhanced address mapping capabilities,
- Improvements to the consumer workflow to allow for address changes and provide a new dashboard of available tasks, and
- Enhancements to paper forms, including pre-population of certain consumer data and the addition of control numbers to improve customer service processes.

In addition to new/improved functionality, USAC continuously fine-tunes instructions and content in the portal and on the NV website to ensure user understanding. For example, when it was clear that applicants needed more guidance around the documentation needed to resolve failed validations, USAC updated the rejection reason descriptions in the portal.

#### A major enhancement underway in 2019 is the carrier API.

Service providers have requested more automated access to the National Verifier in order to simplify and streamline the application process. USAC and the FCC heard this feedback and technical development work is in progress.



## Status of the Representative Accountability Database (1/2)

In its 2017 "Safeguards Letter," the FCC directed USAC to create a system for registering service provider representatives that would include the ability for USAC to:

- Verify representatives' identity,
- 2 Link representatives who handle Lifeline program enrollment and other related transactions, and
- 3 Lock representatives suspected of fraud out of its system.

In response to this request, USAC developed and launched the first phase of the Representative Accountability Database (RAD) on June 25<sup>th</sup>, 2019. Service provider representatives are now able to obtain a unique ID, which will be used to track transactions in NLAD and in the National Verifier. Implementation will occur in three phases:

Phase 1: Allow existing representatives to register and obtain a Representative ID. Phase 1 began June 25<sup>th</sup>, 2019.

Phase 2: Allow service providers to link Representative IDs to existing accounts and API IDs.

Phase 3: Service providers are required to include the Representative ID with all transactions, including those submitted by API.



## Status of the Representative Accountability Database (2/2)

#### RAD consists of four main components:





Phase 1 - Register: Verify identity and create a Representative ID





Phase 2 - Link: Link representatives to specific companies through user accounts





**Lock Outs:** Monitor activity through reporting and lock out individual users as needed

Phase 3- Reports &





Phase 4 - RAD **Confirmation:** Regularly confirm representatives' status

USAC believes the Representative Accountability Database will reduce the number of bad actors driving fraud, waste and abuse in the Lifeline program. RAD will be linked with the National Verifier so that if a user is locked out of NLAD, they will also be locked out the NV.

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# There are a variety of different criteria by which applicants can demonstrate eligibility for Lifeline

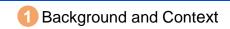
Current % of Lifeline

		through criterion <sup>1</sup>	Comments
Medicaid	TA STATE	27%	<ul> <li>Qualify through enrollment in Medicaid</li> </ul>
SNAP	SNAP	33%	Qualify through enrollment in SNAP
SSI	TISA TISA	2%	Qualify by receiving SSI payments
Federal Public Housing Assistance		0.6%	<ul> <li>Qualify by receiving public federal housing benefits</li> </ul>
Income	IRS	7%	<ul> <li>Qualify if income is at or below 135% of the federal poverty line</li> </ul>
Tribal <sup>2</sup>	1824	0.1%	<ul> <li>Qualify by receiving certain tribally-focused assistance programs<sup>3</sup></li> </ul>
VA		0.1%	<ul> <li>Qualify by receiving the Veterans Pension / Survivor Benefits</li> </ul>

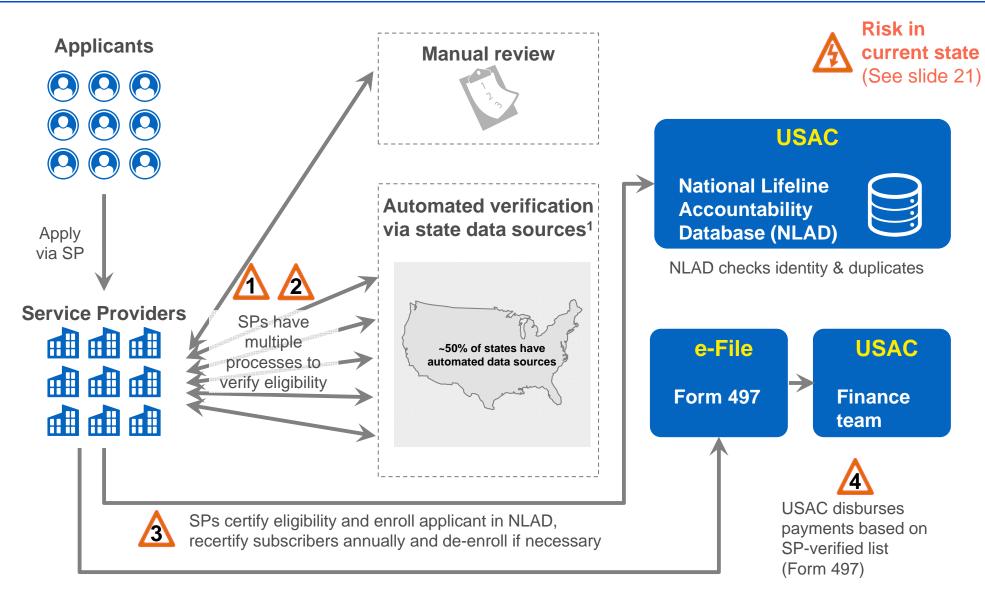
<sup>1.</sup> Percentages as of June 2019. Numbers do not add to 100% due to rounding and the 2016 Lifeline Order's removal of certain qualifying criteria for Lifeline eligibility determination.

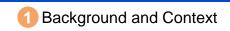
<sup>2.</sup> Must live on Tribal land to qualify through Tribal programs

<sup>3.</sup> Bureau of Indian Affairs General Assistance, Tribally-administered Temporary Assistance for Needy Families, income-based Head Start, or the Food Distribution Program on Indian Reservations

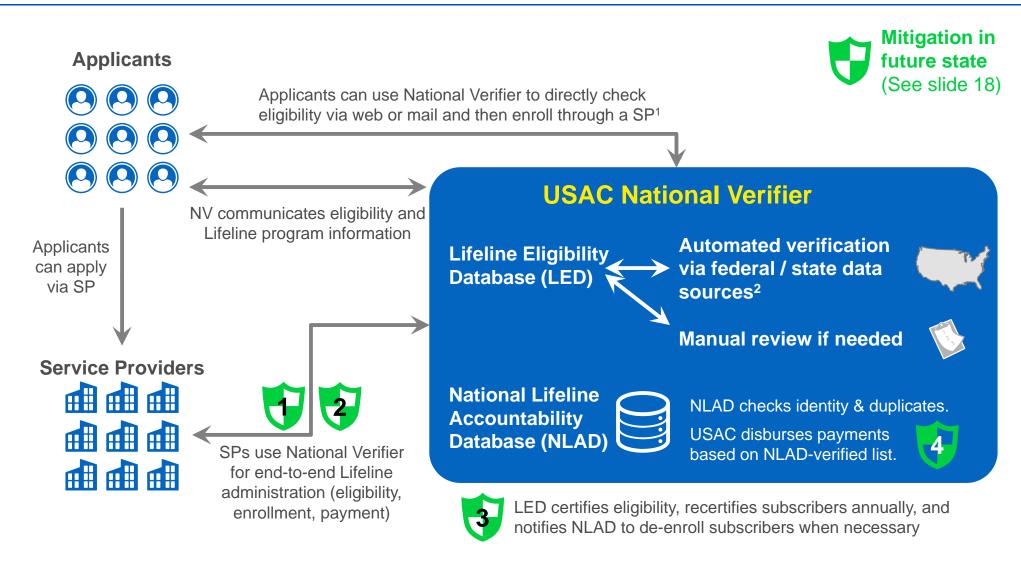


# Lifeline is moving from Service Providers conducting eligibility verification...

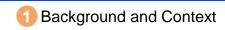




# ...to a model where USAC conducts eligibility verification through the National Verifier...



<sup>&</sup>lt;sup>1</sup>If eligible, applicant receives application number and list of nearby SPs <sup>2</sup>For example, Medicaid, SNAP, SSI



# ...which is designed to address several program integrity risks in the current Lifeline program

### **Current program integrity risk**



Service Providers conducting Lifeline eligibility verification creates potential for waste, fraud, and abuse



Variation in eligibility verification processes across Service Providers and states creates potential for confusion, errors, inconsistency

### **NV** mitigation strategy



Centralizes eligibility verification with USAC, a neutral party

Standardizes eligibility verification processes through the National Verifier



- More automated verification by pinging state and federal data sources increases accuracy
- Centralized manual reviews conducted by BPO vendor that adheres to consistent quality control standards



Subscribers whose eligibility has lapsed may not be timely de-enrolled from NLAD



Automates recertification to re-confirm eligibility (removing need for self-certification for majority of subscribers)

Automates de-enrollment of subscribers due to non-response for self-certification



Payment complexity due to separate processes for enrollment and claims for reimbursement



Unified NLAD / LED systems streamline ability to tie disbursements directly to subscribers claimed in NLAD

# USAC is taking near-term steps to improve these risk areas in parallel to building the National Verifier

### **Current program integrity risk**

### **Near-term mitigation strategy**



Service Providers conducting Lifeline eligibility verification creates potential for waste, fraud, and abuse



USAC samples eligibility verifications performed by Service Providers, tracks activity by sales agent, and continues to enhance audit processes including the creation of a forensic audit program



Variation in eligibility verification processes across Service Providers and states creates potential for confusion, errors, inconsistency



USAC ensures that Service Providers are using the available state data sources to minimize manual review processes, and verifies this through sampling and audits



Subscribers whose eligibility has lapsed may not be timely de-enrolled from NLAD



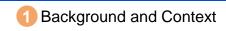
USAC samples recertifications performed by Service Providers, monitors for deceased subscribers who should no longer be claimed, and continues to enhance audit processes



Payment complexity due to separate processes for enrollment and claims for reimbursement



Beginning with the January 2018 data month, service providers in all states are paid based on the number of subscribers in NLAD. In addition, USAC rejects Form 497 claims in excess of NLAD.<sup>1</sup>



# With the implementation of the National Verifier, eligibility verification is shifting from Service Providers to USAC

#### **Service Providers**

**Facilitate consumer application process** 

Support document upload for manual eligibility checks (if needed)

Provide consumer support as appropriate

Retain applicant-provided eligibility / identity documents according to Lifeline rules for new applicants

Check state sources (including manual review where necessary) to confirm consumer eligibility

Conduct annual recertifications<sup>1</sup>

#### **USAC**

Conduct identity and duplicate checks (NLAD)

Process consumer applications and confirm eligibility prior to enrollment

Conduct all annual recertifications

Provide full service consumer support

Complete computer matching agreements with state and federal agencies

New roles

Reduced burdens

The NV also reduces burden on some state and federal agencies who currently share eligibility data with multiple service providers. Under the NV, the agencies only need to share data with one entity, USAC.

## High-level overview of the system

### **Eligibility**

## Lifeline Eligibility Database (LED)

Federal/
State data
sources



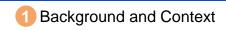
- One eligibility engine with many functions:
  - Query qualifying program data sources to determine eligibility;
  - Store yes / no eligibility results; and
  - Queue applications to BPO for manual review when necessary<sup>1</sup>
- Portals for eligibility verification (e.g., consumer web portal)

#### **Enrollment**

# National Lifeline Accountability Database (NLAD)

- Database of all enrolled Lifeline subscribers for calculating payments to SPs;
- Services to check duplicate subscribers / addresses and verify identity; and
- Portal for subscriber updates

From a technical standpoint, LED and NLAD are tightly integrated as part of the single National Verifier solution to ensure a streamlined experience.



### Functions and processes in place to support the system

New capabilities come from both internal and external sources

#### **USAC** capabilities

#### **USAC / Lifeline team**

Rigorous vendor management

Additional capacity for stakeholder engagement and development of computer matching agreements

Complex project planning and KPI tracking

Additional advanced data analytics to detect waste, fraud, and abuse

#### **Vendor capabilities**

#### **Systems integrator**

Build the National Verifier with all capabilities required to enable the timely and successful completion of its goals

Build the National Verifier to comply with all applicable security- and privacy-related standards and regulations

Test the National Verifier systems to ensure an optimal user experience

#### **BPO** provider

## Manual processes and consumer call center to:

- Conduct manual eligibility reviews when automatic checks are not available
- Receive and process mailin applications and IVR recertifications
- Support communication methods (e.g., mail recertification notices)

General consumer support, including all dispute resolutions

## Total budget to run NV ~\$40-55M by steady state in 2020

Build costs expected to be ~\$35-40M (spent over 3 years)

#### Total Build Budget for the National Verifier

National Verifier build grand total (\$) (costs incurred over ~3 years)

~\$35-\$40M

Through June 2019, USAC is on budget for the project and expects this trend to continue.

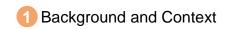
### **Budget Estimate for the National Verifier<sup>1</sup> – Steady state in 2020**

for steady state:

- The NV has launched nationwide:
- **Assumptions** All available federal / state data sources are integrated; and Large majority of eligibility verifications are automated
  - Approximately 15M applicants and 13M subscribers.

<ul> <li>Verification:</li> <li>Application processing;</li> <li>Eligibility verification (automated / manual); and</li> <li>Recertification outreach.</li> </ul>	~ \$25-30M	See comparison to current costs incurred by SPs on next slide	
Consumer support:	~ \$10-15M	Costs will grow from	
Tech systems / tools:	~ \$4-6M		
Human capital:	~ \$3-5M	states launch NV	
Operations grand total (\$)	~\$40-\$55M		

<sup>&</sup>lt;sup>1</sup>Cost estimates based on interviews with Service Providers and state administrators. Volume assumptions vary annually and these assume a steady state subscribership of approximately 13M.



# NV direct verification costs expected to be half of direct verification costs currently incurred by service providers

## Efficiencies gained by the National Verifier

## Increased automated verification for enrollment

- Automated API link to federal and state data sources where possible; and
- Costly manual verification only if applicant is not found in a data source.

## Automated verification and notification for recertification

 Costly outreach (e.g., mail and reminder calls / texts) only if subscriber is not found in a data source.

Larger volumes enable efficiencies of scale and drive down costs.

### Estimated direct verification cost savings1 **Millions SPs** 100 **USAC Total Cost** 60 30 Pre NV Post NV steady state Cost Per \$5 \$ 2 Avg. subscriber<sup>2</sup>

<sup>&</sup>lt;sup>1</sup>Only includes enrollment and recertification costs; does not include consumer support, tech systems, or human capital costs.

<sup>&</sup>lt;sup>2</sup> Assumes 13M subscribers both pre-NV and post-NV.

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## **Eligibility Data Sources: Executive summary**

The National Verifier system connects with data sources to verify identity and determine if a Lifeline applicant is eligible.

NLAD has always utilized third party identification and address verification services. The National Verifier continues to use these services and also utilizes eligibility data sources.

USAC and the FCC are working with state and federal agencies, as well as Tribal governments who administer qualifying programs, to obtain access to eligibility information.

This process culminates in computer matching agreements between USAC, the FCC, and the entities who maintain eligibility program enrollment data. Finalized computer matching agreements are public documents and are available on USAC's website.

While applications in all states will be queried against federal databases, not all states will have connections to state databases. Any applications that cannot be verified through available databases will result in a manual review of submitted documentation.



# The National Verifier interacts with distinct data sources to answer each question in the application process

	Application question	Verification Step	Activity to complete	Data source	
	Does your personal information pass identity verification?	identity & identifiable information (P address check against third party identity verification system (TPIV)		NLAD	
	Are neither you nor anyone in your household currently receiving Lifeline?	Duplicate check	conduct address verification; check applicant PII against those already enrolled in Lifeline	NLAD	
for	Are you eligible for the Lifeline	Eligibility check	1st Step: Check applicant PII against automated data sources to determine if they are enrolled in a qualifying benefit program	1st Step: State or federal data sources of qualifying programs	
	program?		2nd Step (if necessary): Conduct manual review to determine eligibility	2nd Step (if necessary): Eligibility documents from qualifying programs	
				Focus of this section	



# Eligibility data sources can be accessed in a number of ways

The National Verifier accesses eligibility data from available data sources through a variety of methods.

- Application Programming Interface (API): Connections that transfer data in real time on a per inquiry basis.
- **Batch Processing:** Connections that provide results for multiple inquiries on a regular basis daily, weekly or monthly.

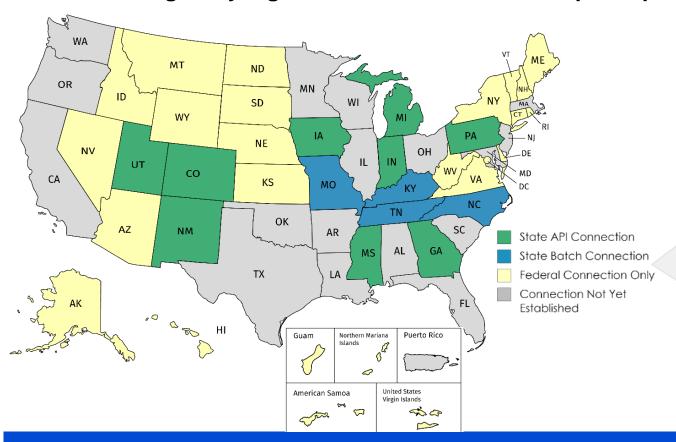
Due to technological or other constraints, the National Verifier may not always have an automated data source to verify a consumer's eligibility in every state or territory. In these cases, consumers will need to submit eligibility documentation for review.

USAC and the FCC are pursuing as many automated connections as possible in order to streamline the process and allow for near real-time responses.



# The thirty-eight states and territories currently participating in the National Verifier have different connection types

#### The following thirty-eight states and territories are participating in the National Verifier:



The National Verifier connects to state/federal databases via API connection or Batch connection.

Note: Chart illustrates the connections that are currently in place. USAC will continue rolling in the remaining states and territories through the end of 2019. In addition, through 2019 and beyond, USAC will work with states that have launched with federal connections only to establish state connections if able.

Currently, the only federal connection available is with HUD. Federal connections are utilized in all participating states, regardless of the connection type with the individual state. USAC is pursuing additional nationwide data sources (e.g., federal agencies that manage qualifying programs<sup>1</sup>) to validate eligibility in all implemented states and territories.



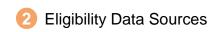
# USAC continuously pursues automation, even in states that have already launched without a state connection

In some states/territories, constraints within the agencies that manage the eligibility data, such as conflicting technical schedules, have made it difficult to establish a connection by the end of 2019.

As the 2016 Lifeline Order requires USAC to roll all states/territories in by the end of 2019, USAC will rely on federal sources while we continue discussions around automated connections with these state agencies.

Below is the status of a few states that have either already launched, or we anticipate they will launch, without a connection to a state database. (This list is not all inclusive, rather it highlights a few examples.)

State	Launch Status	<b>Details</b>
Connecticut	Launched in June '19	State statute prevents state from establishing a connection.
New York	Launched in June '19	State has not agreed to a connection.
West Virginia	Launched in June '19	State has not agreed to a connection.
Illinois	Has not launched yet	Competing state priorities have delayed communication and progress.
Massachusetts	Has not launched yet	State has not agreed to a connection.
Ohio	Has not launched yet	New state leadership requires USAC to re-establish relationships.
Oklahoma	Has not launched yet	Competing state priorities have delayed communication and progress.



# Bringing states into the National Verifier requires USAC and the FCC to work closely with state agencies

## Initially, USAC makes contact with a state and scopes the work. USAC and the FCC may engage in the following activities with the state:

- Identify points of contact
- Conduct briefings for state officials about the Lifeline program and the National Verifier
- Determine technical and programmatic limitations and assets at the state level
- Socialize timelines and USAC business requirements with state officials
- Determine best connection type to pursue

## If USAC, the FCC, and the state agency determine they would like to pursue an automated connection, USAC will:

- Execute a computer matching agreement, signed by the FCC, USAC, and the state agency to
  ensure the data will be shared and used and the individual will not be unfairly denied benefits
  as required by the Privacy Act
- Execute an interconnection security agreement to ensure the data will be protected in accordance with the Privacy Act and in accordance with National Institute of Standards and Technology (NIST) guidelines and Federal Information Security Management Act (FISMA) requirements
- Establish agreed upon business and technical requirements
- Develop and test connection based upon technical requirements

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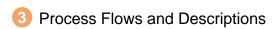
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## **Process Flows and Descriptions: Executive Summary (1/2)**

### Seven key processes are supported by the National Verifier. These include:

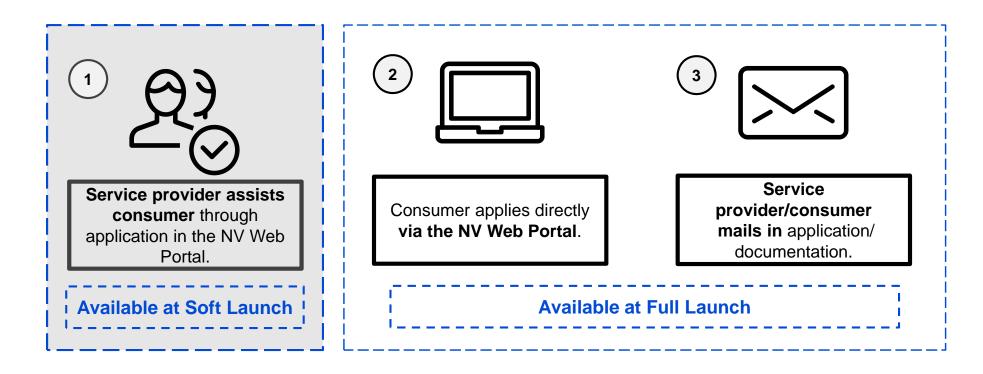
- Eligibility Check
- Manual Review
- Consumer Information Update
- Benefit Transfer
- Recertification
- Reverification
- Claims and Disbursements



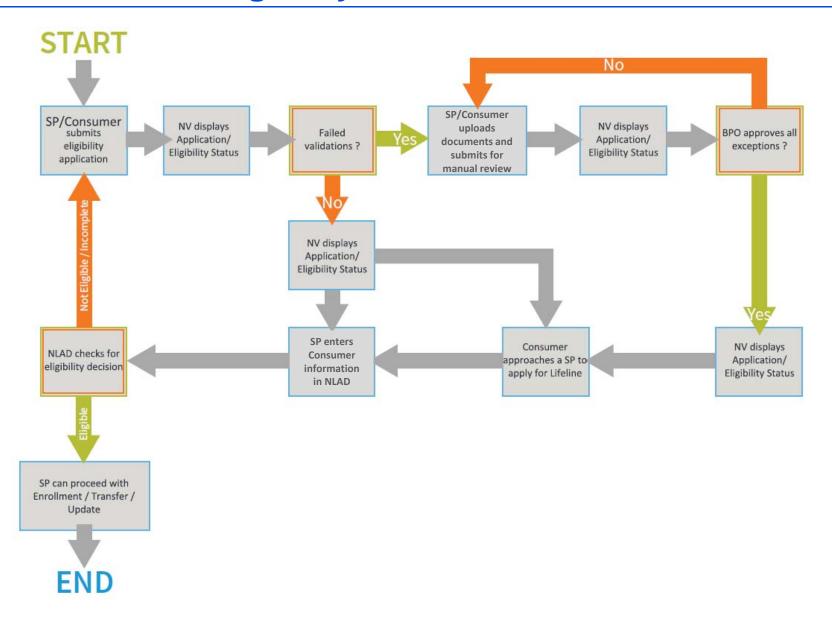
## **Process Flows and Descriptions: Executive Summary (2/2)**

During soft launch, consumers will not have access to the portal and must work with a service provider to verify eligibility.

At full launch, consumers can apply on the portal without assistance from a service provider. In addition, service providers and consumers can mail in applications/ documentation to USAC.



## **Process Flow: Eligibility Check**





## There are some key changes to the eligibility check process that accompany the launch of the National Verifier

#### **Before the National Verifier**

#### **After the National Verifier (Full Launch)**

Service providers conducted eligibility checks

The National Verifier system centralizes eligibility verification

Consumers were typically only able to check their eligibility for Lifeline via one method (through service providers)

Applicants check eligibility directly via the NV Web Portal, mail, or with assistance from a service provider

Not all consumers were able to check their application or eligibility status online at a centralized location Consumers can check their application and enrollment status online or by contacting the Lifeline Support Center

## **Process Description: Service Provider Access**

A service provider (SP) representative will log into the NV Web Portal using their credentials.

SP representatives are not permitted to share accounts; each user must have their own account. Representatives who already have NLAD accounts can use these credentials to log into the NV Web Portal.

With the implementation of the Representative Accountability Database (RAD), SP representatives are now required to obtain a representative ID for tracking purposes. The existing NLAD/NV account management structure is utilized for RAD.

Please see slides 11-12 for more detail on the RAD processes.

If a service provider representative does not have an existing NLAD account, they must have their Admin grant them the appropriate access level. The representative will be given credentials that they can use for the Portal.

# **Process Description: Application with SP Assistance**

## **1** GATHER INFORMATION

The representative will ask the consumer for their information and enter it into the system. Information includes name, address, date of birth, last 4 numbers of Social Security Number (SSN4) and qualifying program(s).

## 2 CONSENT, CERTIFY AND SIGN

The consumer must check a box indicating they consent to use their information to check if they qualify for Lifeline. The consumer must initial electronically that they agree to the Lifeline certifications and must type in their name to sign the application form.

Note: SP representatives cannot consent, certify or sign on the consumer's behalf.

## 3 RESULTS

Once the service provider representative finishes assisting the consumer with the process, the representative will see consumer's status and whether the consumer can be enrolled. Result types are on the next page.

# **Process Description: Result Types**

After submitting all of the required information, the system will return one of the following results types:

#### **Result Type**

**Interpretation** 

"Already Enrolled in Lifeline."



The consumer is already receiving Lifeline benefits, and no action is required. They can transfer their benefit to a new service provider, if desired.

"More Documentation Needed."



The consumer's eligibility was not verified, and they need to submit documentation to prove their eligibility (which may include documents to support identity, address, program eligibility, etc.). *Please see the next process flow on Manual Review for more detail.* 

"Pending Review."



The consumer's Application Form is still under review by the Lifeline Support Center and an eligibility decision is pending.

"Pending Batch Decision."



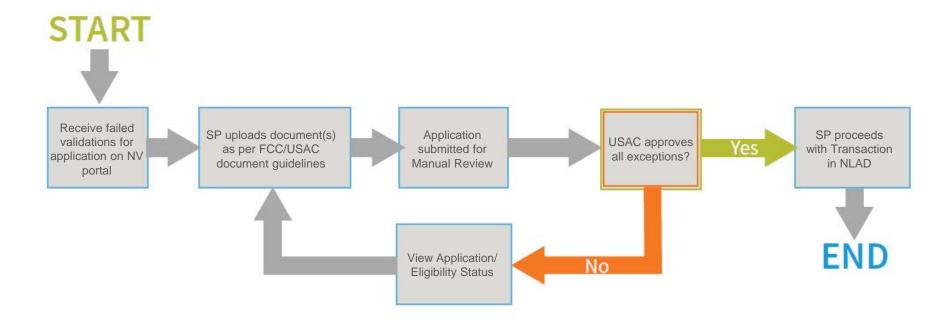
The consumer's eligibility is being confirmed by their state eligibility data source (may take up to 1-3 days). Users are able to submit documentation to resolve all potential errors prior to receiving an eligibility determination.

"Qualified."

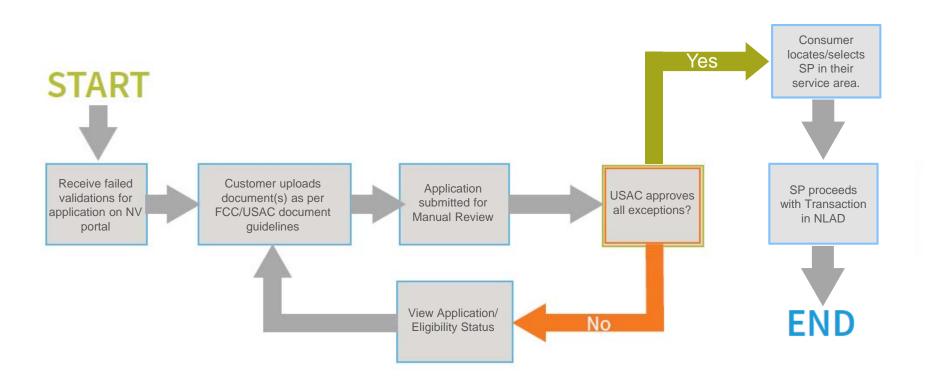


The consumer is eligible for the Lifeline benefit and can be enrolled in NLAD. The consumer needs to be added to NLAD within 90 days or their "Qualified" eligibility result will expire.

# **Process Flow: Manual Review (Service Provider)**



# **Process Flow: Manual Review (Consumer)**





# There are some key changes to the manual review process in the National Verifier system

#### **Before the National Verifier**

#### **After the National Verifier (Full Launch)**

Service providers manually reviewed documentation on **behalf of the consumer** 

Consumer submits required documents directly via the NV Web Portal or mail, and can ask for assistance from a service provider representative if needed

There was variation in manual eligibility review procedures

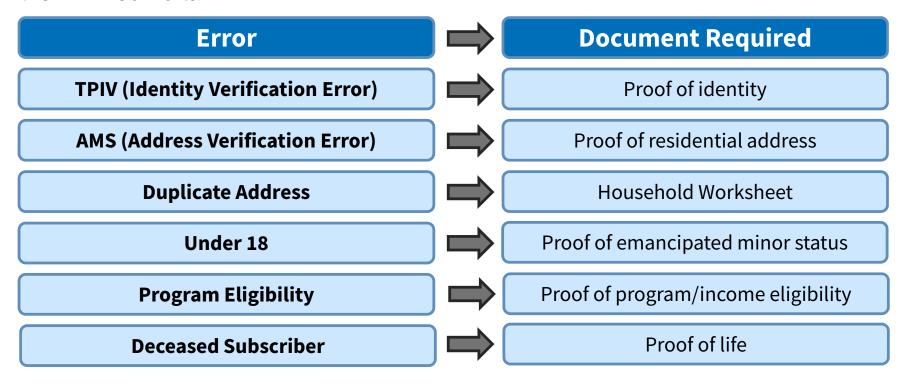
The Lifeline Support Center centralizes and standardizes manual reviews

#### 3

# **Process Description: Error Types**

An application may result in a error that requires the consumer to submit additional documentation\* for Lifeline Support Center manual review.

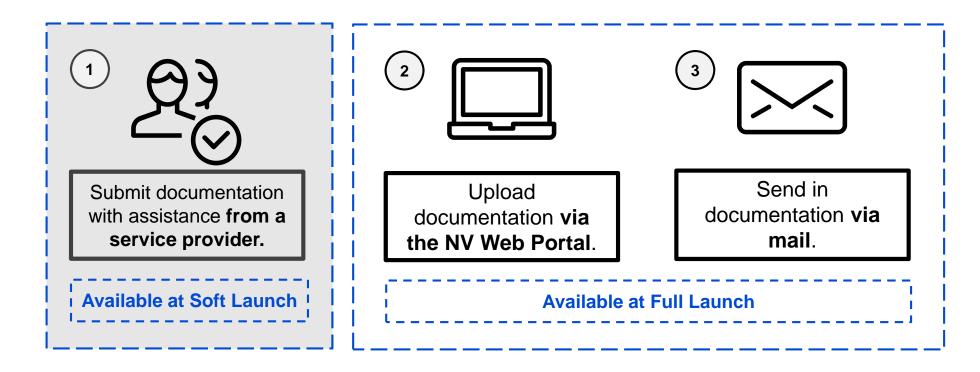
The following errors require additional documentation that must be mailed in or uploaded to the NV Web Portal.



<sup>\*</sup>A list of acceptable documents can be found on the NV website.

# **Process Description: Document Submission**

If the consumer receives an eligibility error, they will be notified of the specific error type associated with their application. Consumers may choose to submit documentation through the following methods.



<sup>&</sup>lt;sup>1</sup> For applications through the portal, key information is communicated directly to the SP and /or consumer via the portal. Additional communication may arrive through email or mail, depending on if the consumer provided an email address during the application process.

## **Process Description: Document Submission Results**

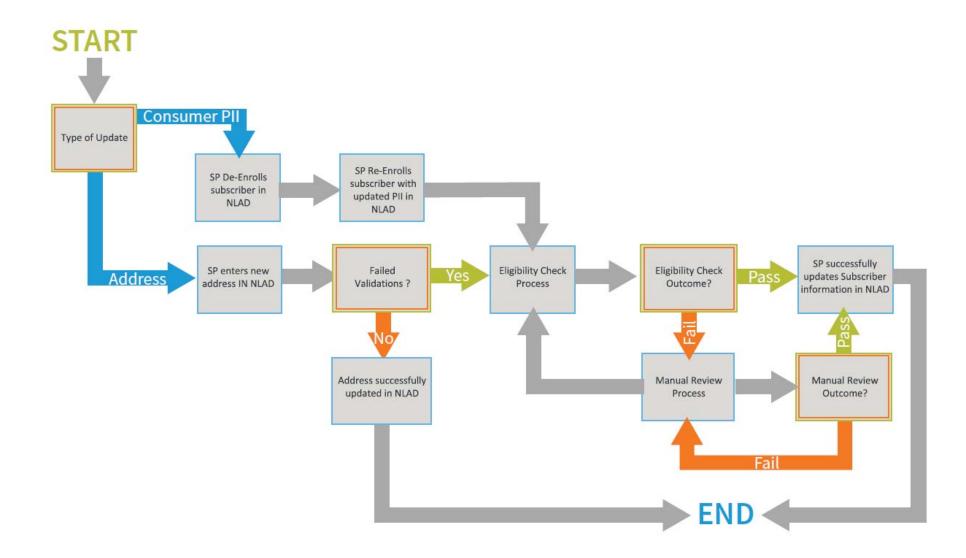
After the service provider or consumer uploads all required supporting documents for manual review, the NV will display a confirmation message to confirm that USAC is reviewing the application to verify the consumer's eligibility to receive Lifeline support.

- If the eligibility check was initiated using the SP portal, the service provider can check the consumer's status through their account. Result types are available on slide 38 in the Eligibility Check section. If the consumer is eligible, the service provider will see their updated eligibility status in the status column of the home page.
- If the eligibility check was initiated by a consumer, their status will be provided to them by mail, email, and/or on the consumer portal (depending on their preferred method of contact).

Upon notification that the consumer is "Qualified," the consumer can select a service provider and request to be enrolled in NLAD.

If the consumer's eligibility still cannot be verified after the documentation review, they can end their application process or ask a SP representative for assistance in submitting the necessary documentation to address the errors. The consumer can also dispute the result of the manual review.

# **Process Flow: Consumer Information Updates**



# **Process Description: Consumer Information Updates**

#### When the service provider is trying to update the Subscriber's address:

#### A Service Provider can only update a Subscriber's address in NLAD.

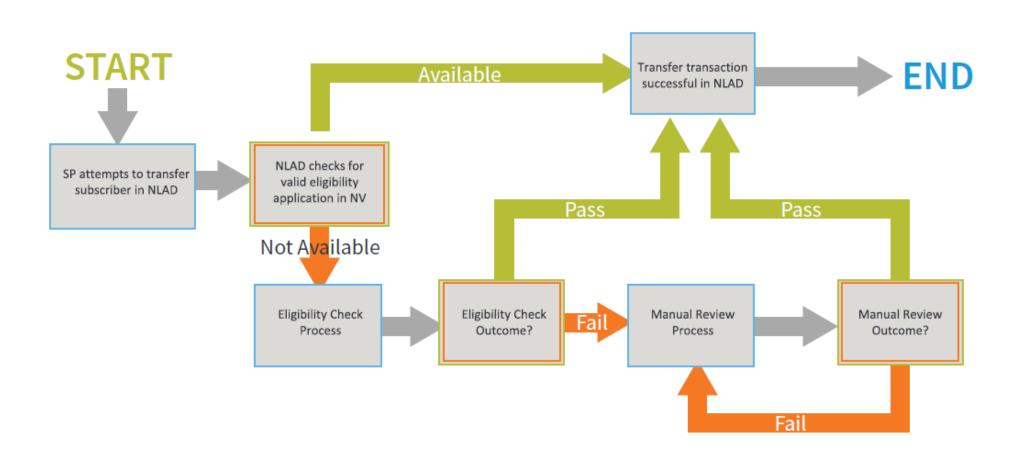
- If the new address passed all validations, the update transaction in NLAD goes through successfully.
- If the new address fails the validations, NLAD checks LED to determine whether an application exists:
  - If an application is found, the consumer's new address must pass the address validations and must not be already in use by another subscriber to receive Lifeline. If there are address failures, all failures must be resolved for the Update transaction in NLAD to go through successfully.
  - If no application is found, the SP will have to submit a new application through the portal and ensure the address is validated or ensure address failures are resolved before the Update transaction can go through successfully.

# In order for a service provider to edit any other field (first/last name, DOB, L4SSN, Benefit Qualifying Person (BQP) information):

The service provider must first de-enroll the subscriber from NLAD and then re-enroll with the corrected PII. When this happens, NLAD will check LED for a qualified application.

- If a qualified application is found, the Enroll transaction in NLAD goes through successfully.
- If no application is found, the SP will have to submit an Eligibility Application in the portal before the Enroll transaction can go through successfully.
- If during the eligibility check, the subscriber has failed any validation check, they need to resolve those issues before the Enroll transaction can be successful.

## **Process Flow: Benefit Transfer**



Process Flows and Descriptions
Benefit Transfer

# There are some key changes to the benefit transfer process in the National Verifier system.

#### **Before the National Verifier**

#### **After the National Verifier**

New service provider representative initiates benefit transfer in NLAD

Benefit transfers cannot occur in NLAD unless NV contains a successful eligibility check for the consumer

# **Process Description: Benefit Transfer**

The new service provider representative logs into NLAD or uses the NLAD API and submits the consumer's PII to check if the consumer has qualified within the last 90 days.

Through this check, the service provider representative will see one of three possible

outcomes:



2

(3)

#### Outcome

The consumer has **no eligibility check result**. No Application Form has been submitted recently.

The consumer has a recent eligibility check result of either "More Documentation Needed" or "Pending Review."

The consumer has a recent eligibility check result of either "Qualified" or "Already Enrolled in Lifeline."







# Action Required

Complete an
Application (Refer to the Eligibility Check process)

**Resolve the errors** (Refer to the Manual Review process)

Enroll the consumer (if they had a "Qualified" Result) or transfer the consumer (if they had an "Already Enrolled" result) in NLAD.

# **Process Description: Benefit Transfer**

Ultimately, the consumer must have an "Already Enrolled in Lifeline" or "Qualified" eligibility result to successfully transfer their benefit or enroll in Lifeline.

Depending on the outcome of the NLAD check, they can arrive at these statuses through one of the following methods:

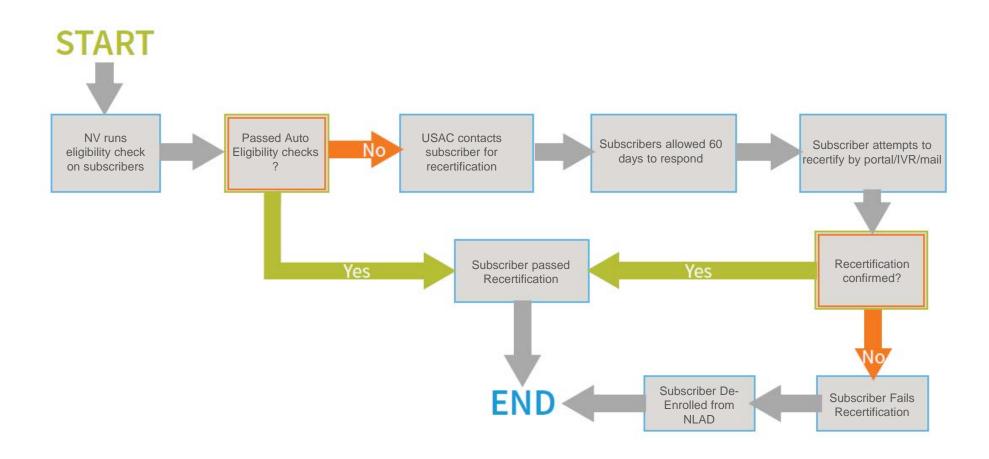
- The NLAD check results in an initial eligibility status of either "Qualified" or "Already Enrolled in Lifeline."
- The consumer sees either of these statuses after completing an Application.
- The consumer sees either of these statuses after resolving the errors associated with their Application.

Once the consumer has the "Already Enrolled in Lifeline" status, the service provider representative can perform the benefit transfer in NLAD. NLAD will:

- 1. Label the consumer as having been transferred as the result of a benefit transfer.
- 2. Notify the old and new service providers of the change.
- End the benefit transfer transaction.

The SP should notify the consumer of the outcome.

## **Process Flow: Recertification**





# There are some key changes to the recertification process in the National Verifier system.

#### **Before the National Verifier**

#### **After the National Verifier**

Service providers **led recertification** or opted for USAC-led coordination

NV automates recertification and prompts consumer action when necessary

Service providers de-enrolled consumers who did not manually self-certify

NLAD automatically **de-enrolls** consumers if they do not pass the automated recertification check and do not manually self-certify



# **Process Description: Recertification (1/4)**

# Consumers already receiving a Lifeline benefit must recertify their eligibility every year to continue receiving their benefit.

The National Verifier will complete recertification on a rolling basis, based on the consumer's Anniversary Date. Service providers will no longer conduct recertification in NV states.

#### The National Verifier will:

- Automate recertification via available state and federal data sources.
- Allow consumers the opportunity to conduct manual self-certification when they do not pass the automated recertification check.
- Provide dynamic status reporting to service providers to track their customers' recertification results.

In National Verifier states, consumers who do not pass the automated recertification check must go through official USAC manual self-certification processes via the NV Web Portal, IVR, or mail. Consumers in NV states cannot manually self-certify through any other processes.

# **Process Description: Recertification (2/4)**

If a consumer does not pass automated recertification, they will receive a letter from the Lifeline Support Center offering multiple ways to manually self-certify. Below are the different processes through which a consumer can manually self-certify:



1. Manually self-certify directly via the NV Web Portal.



2. Manually self-certify directly via IVR.



3. Manually self-certify directly via mail.

# **Process Description: Recertification (3/4)**

Service providers have a time period when they can reach out to the consumer and encourage manual recertification. Below is an example timeline detailing when the service provider can assist with this process.

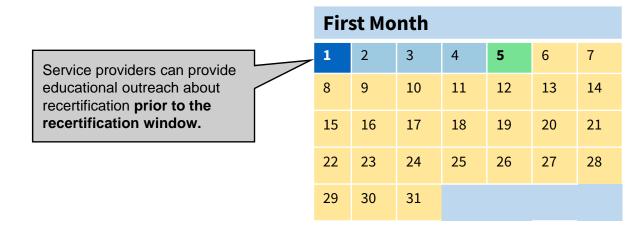


Lifeline Support Center letter sent (will occur no later than 60 days from their Anniversary Date)

Consumer's 60-day window to manually self-certify

Consumer must manually self-certify by this date

**Consumer's Anniversary Date** 



Second Month						
			1	2	3	4
5	6	7	8	9	10	11
12		Service providers can reach				18
19	out	out to consumers during the <b>60-day window</b> .				25
26	27	28	29	30		

Third Month						
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

Note: Dates are for illustrative purposes only

# **Process Description: Recertification (4/4)**

If consumers do not successfully manually self-certify within 60 days of their Lifeline Support Center letter being sent, they will be automatically de-enrolled. NLAD will compile a list of consumers who did not recertify, de-enroll them, and notify the consumers and their respective service providers. The de-enrollment process is below:

2

SPs can check NLAD for the date that their consumers' mailed notification was sent, and the date their 60-day recertification window closes.

NLAD automatically de-enrolls consumers who did not recertify.

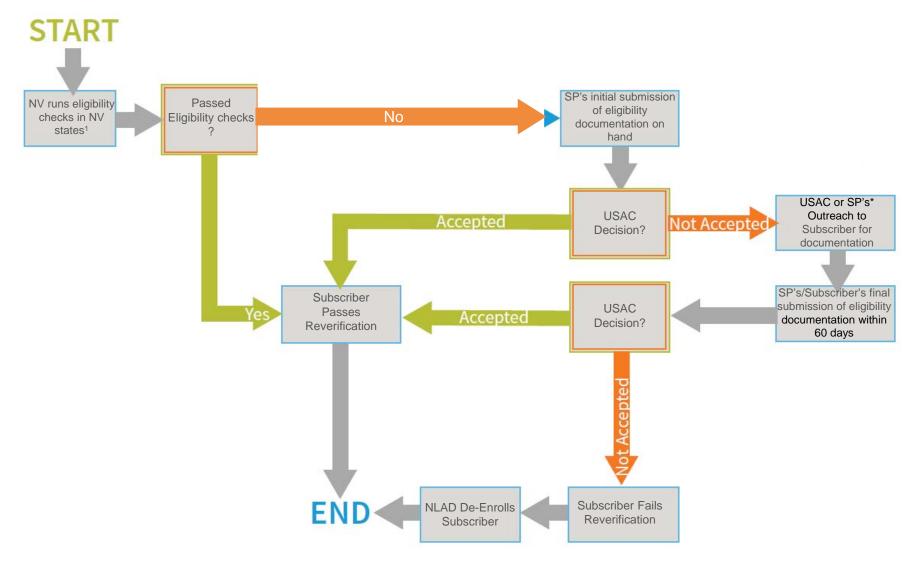
NV notifies service providers via email and deenrolls consumers.

3

They can also check NLAD daily to see how many days the consumer has left to self-certify, and whether they have completed self-certification.

Note: Service providers will also have access to relevant recertification information via NLAD reports.

## **Process Flow: Reverification**



<sup>&</sup>lt;sup>1</sup>The reverification process outlined on this slide only applies to states that are in the National Verifier.

<sup>\*</sup>SPs who opt out of USAC-conducted reverification

# **Process Description: Reverification (1/3)**

When the National Verifier launches in a state, the eligibility of all Lifeline subscribers in that state will be reverified.

- USAC will run existing NLAD subscriber records through the National Verifier to conduct an automated eligibility check (database check)
- If the National Verifier cannot confirm the consumer's eligibility, service providers must follow the reverification process and submit documentation to confirm the subscriber's eligibility before their information is accepted by the National Verifier
  - Service providers must submit on-hand documentation to USAC based upon subscriber enrollment date (requirements around age of documentation will vary depending on the enrollment date)
  - If on-hand documentation is not sufficient or is too old, USAC will conduct outreach to attempt to resolve eligibility failures, unless service provider chooses to perform the outreach themselves

# **Process Description: Reverification (2/3)**

Reverification is the one-time process to confirm that all existing Lifeline subscribers meet the National Verifier's eligibility standards.

Reverification is different from annual recertification.

#### Main differences:

- Reverification happens once, when the National Verifier launches in a state.
- Service provers must complete reverification for all existing subscribers; it is not related to when they last recertified.
- Reverification resets the subscriber's anniversary date and fulfills the annual recertification requirements.

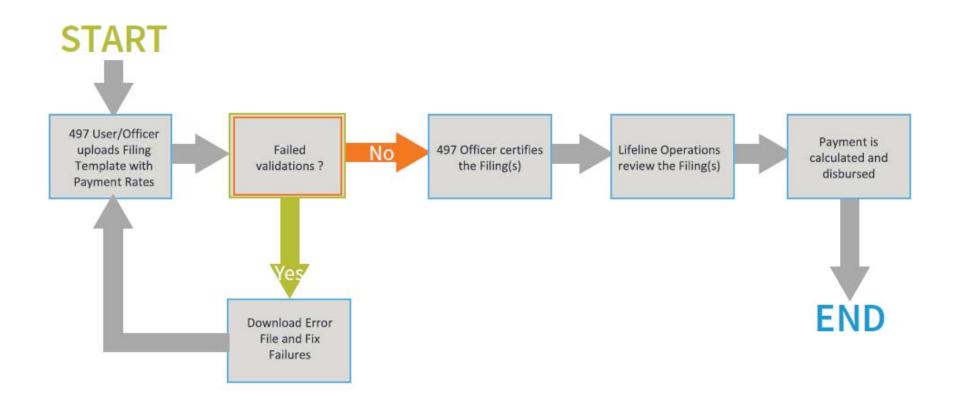
# **Process Description: Reverification (3/3)**

USAC and/or service providers will reverify subscribers in states, as they are rolled into the National Verifier, in four groups, based on their Lifeline enrollment date:

- Group 1: Subscribers recently enrolled (date will vary by launch) at the time of Soft Launch. Documentation collected at enrollment may be accepted. USAC gives <u>45 days</u> for documents to be submitted.
- Groups 2 & 3: Subscribers enrolled prior to the Group 1 cut-off date. USAC will conduct outreach to collect updated/recent eligibility documentation.<sup>1</sup> USAC gives subscribers 60 days to submit documentation.
- Group 4: Subscribers enrolled through the legacy process during the Soft
  Launch period. Documentation collected at enrollment may be accepted. USAC
  gives 45 days for documents to be submitted.

Documentation outreach and collection is only necessary for consumers that are not automatically verified. For additional instructions please reference the USAC website.

## **Process Flow: Claims and Disbursements**



This process is not specific to the National Verifier and applies to all service providers.



# **Process Description: Claims and Disbursements**

#### What is new about this process:

The FCC Form 497 was retired after the December 2017 data month filings.

For data months prior to January 2018, claims were submitted using the FCC Form 497.

Starting with the January 2018 data month, <u>all service providers in all states</u> began using the new Lifeline Claims System (LCS). In this new system, service providers:

- (1) Download a report of subscribers eligible for reimbursement from NLAD.
- (2) Add the dollar amount for subscribers being claimed (or reason code for subscribers being unclaimed), before certifying/submitting the filing for processing.
- (3) Carriers in NLAD opt-out states will not download their list of eligible subscribers; they will upload their subscriber lists directly to LCS.

#### What remains the same:

Service providers are still required to submit a claim (even if there are no changes since previous month).

Snapshot taken on the first day of the month shows the subscriber count for the prior month.

• For example: A snapshot taken on February 1 shows the subscriber count for the January data month.

Service providers to receive reimbursement in the same month if claim is certified by the 8<sup>th</sup> of the month.

Options to report quarterly or up to one year after data month.

Lifeline reimbursement claims do not result in any automatic de-enrollments.

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**Privacy and Information Security** 

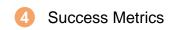
**FAQs** 

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# **Success Metrics: Executive Summary**

Establishing the right metrics is critical to monitoring the success of the National Verifier.

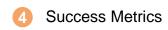
Key performance indicators (KPIs) must measure the success of the National Verifier based on goals outlined in the 2016 Lifeline Order:

- Reducing waste, fraud, and abuse to improve program integrity;
- Improving consumer experience; and
- Reducing cost and complexity.

Thus far, we have identified four primary key performance indicators (KPIs) to track. (KPIs are listed on slide 66.)

- USAC leadership reviews these primary KPIs to facilitate data-driven executive decision making.
- These KPIs complement broader Lifeline metrics that are regularly monitored.
- The KPIs will evolve over time as we continue the rollout of the National Verifier.

USAC will also monitor additional general program metrics (e.g., transaction volume, recertification percentage) to identify anomalies and outliers.



# Based on goals in the 2016 Lifeline Order, we have identified KPIs to measure the success of the NV

1 Stronger Program Integrity

# Protect against and reduce fraud, waste and abuse

- Increase accountability of Lifeline program; and
- Reduce payments to ineligible subscribers.

2 Enhanced Consumer Experience

# Improve consumer experience in the enrollment process

- Streamline consumer application channels; Provide consumer support; and
- Reduce complexity.

3 Cost Effectiveness

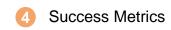
# Lower costs through increasing administrative efficiencies

- Provide automated eligibility verification; and
- Streamline processes for enrollment, recertification, & reimbursement to SPs.

The biggest one time impact on Program Integrity and Cost Effectiveness is the reverification process conducted when a state rolls into the National Verifier.

This process will de-enroll consumers that are not found in the databases USAC has connected to and cannot provide necessary documentation to prove their eligibility.

GOALS



# **Key Metrics and KPI Matrix**

These key metrics will help USAC monitor the success of the National Verifier in the three key areas of **Program Integrity**, **Cost Effectiveness**, and **Consumer Experience**.

	KPI/Metric	Program Integrity	Consumer Experience	Cost Effectiveness
1	% of Enrollments Requiring Manual Review	✓	$\checkmark$	$\checkmark$
2	Repeat Cases (Customer Service or Application Processing)	<b>✓</b>	$\checkmark$	$\checkmark$
3	Processing Time		$\checkmark$	$\checkmark$
4	Actual versus Projected Volumes			$\checkmark$

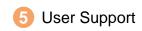
We also use data analytics to track for anomalies and outliers across a number of general program metrics.

Note: Latest metrics can be seen on slide 9.

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# **User Support: Executive Summary**

Proactively engaging key stakeholders is critical to the success of the National Verifier. Stakeholder feedback helps USAC access opportunities and understand the implications of the decisions we make for those who interact with the National Verifier regularly.

To best assist stakeholders, USAC has implemented a comprehensive training plan for service providers serving consumers in states where the National Verifier has launched. Training content includes:

- Live courses delivered via webinar
- Live service provider office hours to answer questions in between webinars
- Supplemental user support materials, including user guides and how-to videos

#### **USAC** will continue to engage stakeholders in future launches through:

- Webinars
- Outreach calls
- Educational content



# Three types of supplemental materials were created to assist users outside of formal trainings

Material		Description	Sample Topics	
	User Guide	Provide comprehensive guidance on system navigation and use	Service provider (SP) functions including:  • Pre-Production  • Eligibility  • Benefit Transfer  • Document Submission  • Address Resolutions  • Updating Consumer Addresses	
<b>%</b> =	How-To Videos	<ul> <li>Provide brief how-to screen demonstrations</li> <li>Focus on one particular system function per video</li> </ul>	<ul><li>Eligibility Check as a SP</li><li>Document Submission as a SP</li></ul>	
	Video Tutorials	<ul> <li>Deliver detailed step-by-step instructions on how to perform specific functions</li> <li>Incorporate screen captures</li> </ul>	<ul><li>Eligibility Check as a SP</li><li>Document Submission as a SP</li><li>Benefit Transfer as a SP</li></ul>	

These materials are available to service providers in NV states on USAC's website.



# During soft launch, service providers can contact USAC through multiple avenues

#### **Dedicated Soft Launch Support Sessions**

- USAC will hold regular service provider assistance sessions after a launch date.
- These sessions will be hosted live on GoToWebinar, and USAC will answer questions and collect user feedback.

#### **Lifeline Support Center Accessibility**

- The Lifeline Support Center customer service representatives will be able to answer questions from service providers submitted via e-mail and phone.
- The Lifeline Support Center is available to carriers and consumers from 9 a.m. to 9 p.m. ET, Monday through Sunday.
  - Carrier and Customer Lifeline Support Center: 1-800-234-9473



# As additional states and territories join the National Verifier, USAC will provide training and support sessions

USAC will gather feedback from National Verifier initial launch participants to refine and update training and support for future launches. This training and support will include:

- Webinars
- How-To Videos
- Video Tutorials
- Office Hours

#### **USAC** continues to engage stakeholders outside of the initial launch states

- National Verifier system demonstrations: USAC walks stakeholders through the National Verifier consumer and service provider portals.
- Monthly calls with NARUC: USAC shares information with and gathers feedback from representatives of the states about the National Verifier system and processes.
- Newsletter outreach: USAC shares National Verifier updates in the Lifeline monthly newsletter.
- Tribal Engagement: USAC attends Tribal workshops and meetings to provide updates on the National Verifier and hear Tribal-specific feedback and questions
- Web content: USAC maintains a National Verifier-dedicated section on USAC.org to inform stakeholders about systems and processes.

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### Privacy and information security: Executive Summary

#### Privacy and data security have been key considerations throughout the development of the National Verifier and its associated processes.

- USAC obtained the Authority to Operate (ATO) prior to the launch of the National Verifier in compliance with the Federal Information Security Management Act (FISMA) and National Institute of Standards and Technology (NIST) requirements.<sup>1</sup>
- USAC's Privacy and Security Teams have been, and will continue to be, key contributors and integral partners throughout the design and implementation process.
- USAC will ensure that the National Verifier continues to adhere to all applicable federal and state security and privacy requirements standards, inclusive of any vendors or contractors who may work on or with the NV.

## The National Verifier and its associated processes are designed to minimize risks stemming from data collection and retention.

- The National Verifier will collect the minimum amount of PII required to successfully execute on its goals.
- USAC will maintain an appropriate data retention policy for all applicant / subscriber data.
  - All data retention policies will comply with USAC and FCC records schedule(s).

# The NV and its related processes must comply with federal privacy and security laws

USAC supports the FCC in administering federal programs. Therefore, USAC adheres to federal privacy and security regulations, including but not limited to the Privacy Act and FISMA.

The National Verifier is a designated federal system of records. The system has undergone FISMA accreditation, completing the six-step Risk Management Framework (RMF) established by NIST.

FISMA accreditation for the National Verifier helps to ensure that the system is secured, that the proper NIST security and privacy controls are operating effectively, and that the system undergoes continuous monitoring. Any changes or modifications to the National Verifier will be assessed and the controls, processes and/or system security plan (SSP) will be updated accordingly.

USAC has also implemented appropriate privacy controls such as obtaining consent, collecting and using the minimum amount of PII necessary, and using PII only for authorized purposes.

USAC vendors and subcontractors are contractually required to meet the same federal security and privacy requirements as USAC.

USAC continues to invest resources into additional testing for the National Verifier to ensure the reliability, availability, and security of the system.

### The NV is designed to minimize data collection and retention to the extent possible in order to limit exposure to risk

#### Subscriber / process information: Keep limited information (including some PII)

#### Information provided by subscribers

- Name (First, Last)
- Address (including geolocation data)
- Date of birth
- Social Security Number (last four digits)
- Eligibility for enhanced Tribal subsidy
- Self-reported qualifying program(s)
- Preferred method of communication
- Contact information (e.g., phone, email)
- Type of service (e.g., broadband, mobile)
- Submitted documents (e.g., for manual review)

#### **Data generated through National Verifier processes**

- Yes / no decision on eligibility from each data source queried (i.e., each program)
- Date of verification
- Application channel (e.g., mail, web portal)
- Name and unique ID of individual SP employee performing any transaction

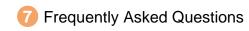
Fields typically transmitted to query eligibility sources

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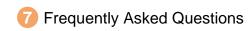
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### **USAC** response to Frequently Asked Questions (1/4)

FAQ	USAC response
What are the functions of the National Verifier system?	<ul> <li>The National Verifier system:</li> <li>Determines initial consumer eligibility</li> <li>Conducts annual recertification</li> <li>Populates the Lifeline Eligibility Database (all subscribers deemed eligible for the Lifeline Program)</li> <li>Tracks all subscribers enrolled in Lifeline through NLAD</li> <li>Records sales agent information in order to log agent activity</li> </ul>
What is the difference between soft and hard launch?	The primary difference is that at soft launch, only service providers are able to use the NV Web Portal, while at hard launch both service providers and consumers can use the NV Web Portal.
	Starting at soft launch, service providers have the option to start using the NV Web Portal and NV forms, but are not mandated to do so until the hard launch.



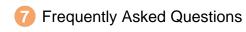
### **USAC** response to Frequently Asked Questions (2/4)

FAQ	USAC response
How can service providers access the NV Web Portal?	Service provider representatives can use their existing NLAD credentials in order to access the NV Web Portal. If they do not have existing credentials, a person with Service Provider Administrator credentials in NLAD can create new service provider accounts.
	The NLAD account types have the same permissions in the NV Web Portal, and varying permissions in NLAD depending on the user type.
Is there an API that permits SPs to interact with the NV?	Based on stakeholder feedback, the FCC and USAC are taking steps to build an API for anticipated implementation later this year that would allow SPs to interface directly with the NV to securely transmit consumer information for purposes of conducting eligibility checks and to receive eligibility result responses (i.e., status checks).
Is the NV Web Portal available in Spanish?	Yes, the consumer NV Web Portal and printed versions of forms are available in Spanish. The service provider NV Web Portal is only available in English at this time.



### **USAC** response to Frequently Asked Questions (3/4)

FAQ	USAC response
What is the difference between applying and enrolling? Can the NV Web Portal be used to enroll a consumer?	The National Verifier enables consumers, and service providers assisting them, to apply for Lifeline by checking their eligibility. Consumers must be eligible for Lifeline and receive a "Qualified" status before they then can be enrolled in Lifeline.
	The NV cannot be used to enroll consumers in Lifeline; enrollments must occur in NLAD.
What are the different ways that consumers can check their eligibility for the Lifeline benefit?	A consumer can apply or check their eligibility for Lifeline with the assistance of a service provider via the service provider NV Web Portal (available at soft launch), the consumer NV Web Portal (available at hard launch), and a printed version of the Application Form or a paper application submitted via mail to the Lifeline Support Center (available at hard launch).
When do consumers need to provide documentation?	When consumers apply, there is a possibility that the NV will be able to verify their eligibility automatically (if they are qualifying through a program that has an automated data source) and no additional documentation will be needed to validate a consumer's eligibility.
	If there are errors associated with a consumer's application, they will need to provide additional documentation to resolve the errors in order to eventually receive a "Qualified" eligibility status. In addition, if the consumer is qualifying through a program that cannot by checked using an automated data source, the consumer will need to provide documentation so that their eligibility can be checked manually.



### **USAC** response to Frequently Asked Questions (4/4)

#### **FAQ USAC** response Is a NV Web Portal account All consumers using the consumer NV Web Portal or service provider representatives using the service provider NV Web Portal must have their needed in order to use the NV Web Portal? own individual accounts. No one is allowed to share accounts with another person. What is the process for qualified If a consumer applies via the service provider portal and is found qualified, consumers to select a carrier? the service provider can enroll them into NLAD immediately after receiving a qualified eligibility decision from the National Verifier. If a consumer qualifies via a paper application, the consumer will be notified by mail of their qualified status and will need to contact a participating Lifeline service provider to be enrolled into NLAD. If a consumer qualifies via the National Verifier Consumer Portal, they will be taken to a "Qualified" screen which will provide instructions to enroll with a carrier. Like with paper applications, the consumer will need to contact a participating Lifeline service provider to be enrolled into NLAD to receive the Lifeline benefit.

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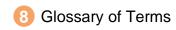
**Glossary of Terms** 

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### Glossary (1/4)

Term	Definition	Explanation	
AMS	Address Management System	A service provided by the U.S. Post Office that allows subscribers to verify the existence of an address, and to standardize it into proper format.	
API	Application Programming Interface	A code that allows two software programs to interact with one another. The API defines the correct methods by which a developer can write a program that requests services from another application.	
ВРО	Business Process Outsourcing	The process of contracting non-primary business activities to a third-party vendor (e.g., consumer support / service, manual review support).	
BQP	Benefit Qualifying Person	If an individual is not eligible for the Lifeline Program discount, but has a child or dependent is eligible, the individual qualifies for Lifeline based on the status of their child/dependent. The eligible child/dependent, in this case, is the BQP.	
СМА	Computer Matching Agreement	The computerized comparison of records for the purpose of establishing or verifying eligibility for a federal benefit program.	
Data use agreement	Data use agreement	A formal agreement between two parties to establish protocols and standards that govern the handling (including storage) of any data transferred between the parties.	
Dispute resolution	Dispute resolution process	A process by which USAC, through the National Verifier, will review an adverse decision upon the request of the applicant.	
FCC	Federal Communications Commission	An independent agency of the United States Federal Government charged with regulating interstate and international communications by radio, television, wire, satellite and cable in all US states and territories.	
Form 497	Form filled out by Lifeline SPs to claim Lifeline subsidies	Form for service providers that have provided eligible consumers with Lifeline Program- supported service to receive reimbursement for providing service at discounted rates. This form is no longer being used to receive reimbursement after the December 2017 data month.	



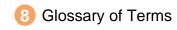
### Glossary (2/4)

Term	Definition	Explanation	
IEH	Independent Economic Household	A unit that may only receive one Lifeline benefit (commonly known as the one-per- household rule); also refers to a form that certain consumers must submit in order to certify that no more than one Lifeline benefit is received per household.	
IVR	Interactive Voice Response	Technology that allows humans to interact with a computer over the phone, through use of speech recognition and/or the telephone keypad.	
KPI	Key Performance Indicator	A business metric used to evaluate performance with respect to factors crucial to the success of the National Verifier.	
LCS	Lifeline Claims System	An online filing system for service providers to submit original and revised claims for providing eligible consumers with Lifeline Program-supported service to receive reimbursement.	
LED	Lifeline Eligibility Database	System to check whether a consumer is eligible for Lifeline based on income or enrollment in qualifying assistance programs.	
NARUC	National Association of Regulatory Utility Commissioners	National association representing state public service (utility) commissioners.	
NLAD	National Lifeline Accountability Database	Existing system that allows SPs to check on a real time, nationwide basis whether a consumer is already receiving a Lifeline Program-supported service, and to maintai records of Lifeline subscribers.	
NV	National Verifier	A system to conduct eligibility determinations and other functions necessary to enroll eligible subscribers into Lifeline.	
PII	Personally identifiable information	Any information about an individual that can be used to distinguish or trace an individual's identity either alone or when combined with other information that is linked or linkable to a specific individual.	

#### 8 Glossary of Terms

### Glossary (3/4)

Term	Definition	Explanation	
RFP	Request for Proposal	A document issued by an organization that desires to procure services or commodities; the document typically outlines the services or commodities desired and initiates the formal procurement process.	
SI	Systems Integrator	A company that specializes in integrating multiple component subsystems or parts into a single system.	
System of Records	System of Records	A group of records under control of any federal agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.	
SORN	System of Records Notice	A notice in the Federal Register in which a federal agency announces the establishme amendment, or deletion of a system of records.	
SP	Service Provider	A telecommunications company that provides service (i.e., wireline voice, wireless voice wireline broadband, wireless broadband) to consumers.	
States	States, territories, and Tribal lands	50 U.S. States + DC, Puerto Rico, Guam, U.S. Virgin Islands, Northern Mariana Islands American Samoa, and tribal lands.	
TPIV	Third party identity verification	A service that verifies the existence of a person who corresponds to the PII submitted by an applicant by using public and private records (e.g., birth certificates, real estate ownership, credit history).	
UI/UX	User Interface / User Experience	The components of a system that humans interact with, as well as the actual experience of an end user's interaction with the system.	



### Glossary (4/4)

Term	Definition	Explanation
USAC	The Universal Service Administrative Company	A non-profit corporation designated by the Federal Communications Commission (FCC) as the permanent administrator of the Universal Service Fund (USF), which includes the Lifeline program.
USF	Universal Service Fund	A fund, established by the Telecommunications Act of 1996, whose goal is to ensure that every American has access to vital telecommunications services; the Lifeline program is a component of the USF.
Verifier Partner	A data source used to check for Lifeline eligibility	An agency or organization (often, but not exclusively, governmental) that partners with the National Verifier to provide a data source that the National Verifier can check in order to determine whether an applicant is eligible for the Lifeline subsidy.